

KAISERAIR, INC.

July 19, 2022

U.S. Department of Transportation
Docket Management System
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Petition for Exemption: FAR §121.434(c)(1)(ii)

Name of Petitioner:

KaiserAir, Inc. COZA
8735 Earhart Road
Oakland, CA 94621

Ladies and Gentlemen,

In accordance with Title 14 of the Code of Federal Regulations §11.61, KaiserAir, Inc petitions the Administrator for an exemption to 14 CFR §121.434(c)(1)(ii). Subject to certain conditions and limitations, this exemption would permit KaiserAir, Inc. to substitute a qualified and authorized check airman in place of an FAA inspector to observe a qualifying pilot in command (PIC) who is completing initial or upgrade training specified in 14 CFR §121.424 during at least one flight leg that includes a takeoff and landing.

This exemption would serve in the public's interest and have no adverse effect on public safety for the following reasons:

1. Using an authorized Check Airman in place of an FAA inspector would allow for the timely qualification of KaiserAir, Inc. PIC's. Current delays can be up to two months for an observation, which increases the workload on qualified crewmembers and decreases overall pilot rest times.
2. A portion of KaiserAir, Inc's business provides charter services to the government, which support the federal transport of disaster relief, military, and firefighting personnel. The requested exemption would benefit those services allowing the Company to qualify PICs more promptly.
3. A KaiserAir, Inc. check pilot is the most knowledgeable of KaiserAir processes and procedures, thereby providing the highest level of quality assurance and safety to KaiserAir, Inc., the flying public, and the National Airspace System.
4. A lower financial burden would be incurred by the Administrator. The public would appreciate their tax dollars being re-directed to other safety related issues.

KaiserAir, Inc. would propose to exercise the requested exemption under the following conditions and limitations:

1. A KaiserAir, Inc. Check Airman may conduct a PIC observation in place of an FAA inspector when:
 - a. The administrator preapproves that substitution for each observation of a qualifying PIC candidate, thus reserving the right of refusal to the FAA in each case. KaiserAir, Inc. therefore must contact the appropriate FAA office, in each instance, before substituting that Check Airman;
 - b. The qualifying PIC candidate has completed no less than 10 hours of supervised operating experience (OE) and accomplished no fewer than two takeoffs and landings; and
 - c. The qualifying PIC candidate is performing PIC duties during a complete flight leg, including flightdeck preparation, before starting engines checklist, taxi, takeoff, all other flight phases, landing, taxi and securing checklist.
2. Each KaiserAir, Inc Check Airman conducting a PIC observation in place of an FAA inspector must-
 - a. Be approved by the administrator to conduct the observation;
 - b. Have served as a Check Airman for no less than 6 months;
 - c. Not have conducted the initial line check and most recent 10 hours of IOE for the qualifying PIC candidate being observed;
 - d. Conduct the observation from the observer seat.

Please feel free to contact me with any questions, as we are happy to provide additional documentation should it be necessary.

Thank you for your consideration,

Sincerely,

John H. Rosa
Asst. Chief Pilot
KaiserAir, Inc.
925-818-6344